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DIRECTORATE OF DEFENSE
TRADE CONTROLS



REGISTRATION



- WHAT IS REGISTRATION?
 - A means to provide the U.S. Government with information on who is involved in manufacturing, exporting and /or brokering certain commodities.
 - A prerequisite for obtaining export licenses and other approvals from the State Department.



Who Must Register?



- Any company or individual who -
- Manufactures defense articles
- Exports defense articles
- Furnishes defense services
- Engages in brokering activities
- Authority -ITAR 122.1 and 129.3



How Do You Register?



- Statement of Registration
- Form DS 2032
- Must be signed by a senior official
- Transmittal Letter

Must be signed by the same senior official

Letter is different from the transmittal letter submitted

with export licenses. Must be completed in its entirety.



Exemptions



Applicant Assumes Responsibility for Correct Use and Risk of Violation - You Become A Licensing Officer

Ensure Responsible Officials Have Thorough Knowledge of Exemption/Conditions/Requirements: Beware Extrapolations!

Exemptions vs Exceptions: Only ITAR Provides Exemptions

Monitor Use and Ensure Compliance



Destination Control Statement ITAR 123.9(b)



- **Refer to ITAR 123.22 “Filing of Export Licenses and SED’s with Customs”**
- **On SED, Cite specific exemption language “22 CFR 123**



Canadian Exemption 22 CFR 126.5



- For end use in Canada by a Canadian Registered Person
(Organized under the laws of Canada IAW Defense Procurement Act)
- Canadian Federal or Provincial Governments
- Permanent or Temporary Import or Export
- Except for 22 CFR 126.5 (b)(1) thru (b)(20)



Canadian Exemption 126.5



- **Recordkeeping Requirements extremely important--5 years**
 - Description of the technical data,
 - Name of recipient end-user,
 - Date and time of export
 - Method of transmission.
- **Defense articles and technical data must remain in Canada**
- **Be careful of business meetings!**



Summary



- **Fun part of the ITAR**
- **Do Not Need Prior Approval-No Waiting period**
- **Not For Prohibited Parties**
- **Follow Record Keeping Requirements**